

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO:</b> _____
<b>v.</b>	:	<b>DATE FILED:</b> _____
<b>QUINN MCCLENDON</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 656 (embezzlement by a</b>
	:	<b>bank employee - 1 count)</b>
	:	<b>18 U.S.C. § 2113(b) (bank theft - 2</b>
	:	<b>counts)</b>
	:	<b>Notice of forfeiture</b>
	:	
	:	
	:	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From in or about April 2015 to in or about February 2016, in the Eastern District of Pennsylvania, defendant

**QUINN MCCLENDON,**

being an employee of Citizens Bank, located at 2014 Cottman Avenue, Philadelphia, Pennsylvania, a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled, abstracted, purloined and willfully misapplied approximately \$46,000 of funds and monies intrusted to the custody and care of Citizens Bank.

In violation of Title 18, United States Code, Section 656.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 15, 2015, in the Eastern District of Pennsylvania, the defendant,

**QUINN MCCLENDON**

did take and carry away with intent to steal and purloin approximately \$26,000 of money, belonging to and in the care, custody, control, management and possession of Citizens Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(b).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 2, 2015, in the Eastern District of Pennsylvania, the  
defendant,

**QUINN MCCLENDON**

did take and carry away with intent to steal and purloin approximately \$20,000 of money,  
belonging to and in the care, custody, control, management and possession of Citizens Bank, a  
bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(b).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 656, set forth in this indictment, defendant

**QUINN MCCLENDON**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such violations including, but not limited to, the sum of \$46,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

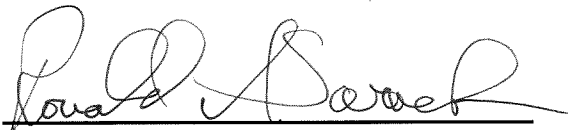
incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

  
for **WILLIAM M. McSWAIN**  
**UNITED STATES ATTORNEY**